
United States District Court
District of New Jersey

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. :
JAMES ROBINSON : **Magistrate No. 08-3651 (MF)**


I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. From in or about March 2008 through in or about September 2008, in Union County, and elsewhere within the District of New Jersey, defendant James Robinson:

did knowingly and intentionally conspire and agree with others to execute and attempt to execute a scheme to defraud a financial institution and to obtain money and other property owned by a financial institution by means of false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

I further state that I am a Special Agent for the United States Secret Service ("U.S.S.S.") and that this complaint is based on the following facts:

SEE ATTACHMENT A.



Hazel Cerra
Special Agent, United States Secret Service

Sworn to before me and subscribed in my presence,

September 17, 2008
Date

Newark, NJ
City and State



HON. MARK FALK, UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

I, Hazel Cerra, am a Special Agent, with the United States Secret Service ("USSS"). Based upon my investigation and my discussions with other individuals involved in this investigation, I have knowledge of the following facts:

1. At all times relevant to this complaint, Washington Mutual Bank was a financial institution within the meaning of 18 U.S.C. § 20.
2. This investigation, including undercover surveillance and the review of certain documents, has revealed that in or around March 2008 through September 2008, James Robinson ("Robinson") conspired and agreed with others, including Individual 1 and Individual 2, to secure through fraudulent means and subsequently use, approximately thirty-nine (39) credit card accounts issued by Washington Mutual Bank, to purchase, among other things, diesel gasoline, which Robinson and others resold to drivers at a substantial discount. For example:
 - a. On or about July 3, 2008, Robinson used a Mastercard issued by Washington Mutual Bank, in the name of "C.P.", with account number ending in: 5019, to purchase diesel gasoline from a service station in Union, New Jersey. On the same date, Robinson, with the help of Individual 1 and Individual 2, resold the diesel gasoline he purchased with the Mastercard issued to C.P. to several commercial truck operators with whom Robinson, Individual 1, and Individual 2 had pre-arranged such transactions.
 - b. On or about July 22, 2008, Robinson used a Mastercard issued by Washington Mutual Bank, in the name of "L.R.", with account number ending in: 6018, to purchase gasoline from a service station in Union, New Jersey. On the same date, Robinson, with the help of Individual 1 and Individual 2, resold the diesel gasoline he purchased with the Mastercard issued to L.R. to several commercial truck operators with whom Robinson, Individual 1, and Individual 2 had pre-arranged such transactions.
 - c. On or about July 22, 2008, Robinson used a Mastercard issued by Washington Mutual Bank, in the name of "L.D.", with account number ending in: 7011, to purchase diesel gasoline from a service station in Union, New Jersey. On the same date, Robinson, with the help of Individual 1 and Individual 2, resold the diesel gasoline he purchased with the Mastercard issued to L.D. to several commercial truck operators with whom Robinson, Individual 1, and Individual 2 had pre-arranged such transactions.